



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

MEB/HDM
F. #2016R00695

*271 Cadman Plaza East
Brooklyn, New York 11201*

October 8, 2019

By Email

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Re: United States v. Jean Boustani et al.
Criminal Docket No. 18-681 (WFK)

Dear Counsel:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure consisting of materials with Bates DOJ0003085225 through DOJ0003085227. This disclosure supplements the government's earlier disclosures. The government again requests reciprocal discovery from the defendants.

- DOJ0003085225: [REDACTED] material received yesterday. We believe this material is duplicative, at least in part, of material the government produced to the defendant in January 2019 at DOJ0000579811-DOJ0000673384. In the interest of time, we have not assigned individual bates numbers to this material. We will reproduce this material with individual bates numbers when it is processed.
- DOJ0003085226-DOJ0003085227: [REDACTED] materials.

Defense Counsel

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Also enclosed please find the government's production of supplemental 18 U.S.C. § 3500 material ("supplemental 3500 material"), and a list of the supplemental 3500 material, which the government has received since its last production of supplemental 3500 material on October 4, 2019. The supplemental 3500 material was sent by email. The government reserves the right to amend, supplement or alter the enclosed list, and to withdraw or supplement material produced pursuant to 18 U.S.C. § 3500 prior to trial

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney
Eastern District of New York

By: /s/
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